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A city ordinance afterwards declared void imposed a license fee upon those engaged in the sale of fresh meats. Such fees were collected by city's police under threat of arrest for refusal of payment. Evidence tended to prove that the marketmen did not know but what each officer had such warrant at the time of making such threat. Held, that the payment was under duress, and could be recovered.

Discharge in Insolvency—Non-resident Partner.—Chase et al. v. Henry, 44 N. E. 988 (Mass.) Where one of three partners, plaintiffs in an action against an insolvent debtor, resides out of the State in which the debtor has been discharged in insolvency, the debt, though barred as to the others, is valid in his favor. (Three judges dissenting).

Habeas Corpus—Verity of Court Records—Collateral Attack.—Whitten v. Spiegel, Sheriff, 35 Atlantic Rep. 508 (Conn.). The foreman of a Grand Jury by a clerical mistake, indorsed an indictment against the plaintiff as a true bill although in fact it had been found not to be a true bill. Held, that the records of the Criminal Court are in a collateral proceeding conclusive evidence that the cause was fully within the jurisdiction of the court and no writ of habeas corpus will lie.

Invalid Trust Deed—Estoppel—Equitable Lien—Bona Fide Purchaser—Notice.—Barrett v. Baker, 37 S. W. Rep. 130 (Mo.).—A deed of trust executed by the maker of a note on land to which he had no title, but which belonged to the payee, is invalid; but the payee by selling the note is estopped from denying its validity, and a purchaser of the note has an equitable lien against both the payee and purchasers of the land from him with notice. Held, that a purchaser of the land after the note was due and under an abstract of title noting said trust deed, but also containing an attested statement of the payee that he was the legal holder of the note and acknowledged payment thereof and satisfaction of the trust deed, was a bona fide purchaser without notice.

Misuse of Mails—Dunning Letter.—In re Barker, 75 Fed. Rep. 980 (Wis.). A respectful dunning letter in an unsealed envelope bearing the printed words, "Mercantile Protective and Collection Bureau," does not come within the meaning of section 3893, Rev. St., as amended by Act of Congress of Sept. 26, 1888 (25 Stat. 496), prohibiting the sending through the mails of envelopes bearing any language of a defamatory or threatening char-

acter, or calculated by its terms or manner of display, and obviously intended to reflect injuriously upon another.

Negotiable Instruments—Alteration.—*Light et al. v. Killinger*, 44 N. E. Rep. 760 (Ind.). The insertion, in pencil in a negotiable note in ink, by an indorsee, of the name of a certain bank after the words, "payable at," is to be taken as a mere memorandum, and is not such a material alteration as would avoid the note.

Neutrality Laws—Military Expedition—Preparation and Transportation of Military Expedition—Evidence.—*United States v. O'Brien et al.*, 75 Fed. Rep. 900. Circuit Court, S. D., N. Y. The defendants were indicted for violating the neutrality laws of the United States by taking part in the preparation and transportation of an alleged hostile military expedition directed against the power of the King of Spain in the Island of Cuba. Of a military expedition there are three distinguishing marks which must concur within the jurisdiction of the United States: Organization, although without military tactics, among men to act together; the presence of arms or weapons which can be used for military purposes, and some command. The owner of a vessel knowing that it is to be used to transport such an expedition, and all persons who knowingly aid in its preparation are guilty of violating the statute. Secrecy and mystery are not conclusive of the illegality of the enterprise.

Nuisance—What is Not—Matters of Taste.—*Woodstock Burial Ground Association v. Hager*, 35 Atlantic Rep. 431 (Vt.). The fact that a lot is "unsightly and needed to be filled in," etc., does not make it a nuisance. The law does not declare that to be a nuisance which is only a matter of taste, or unpleasant to the eye, or even that renders other property less valuable. There must be some substantial or material right invaded.